

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

**WSOU INVESTMENTS, LLC D/B/A
BRAZOS LICENSING AND
DEVELOPMENT,
*Plaintiff,***

v.

**ONEPLUS TECHNOLOGY
(SHENZHEN) CO., LTD.,
*Defendant.***

§ Case No. 6:20-cv-00952-ADA
§ Case No. 6:20-cv-00953-ADA
§ Case No. 6:20-cv-00956-ADA
§ Case No. 6:20-cv-00957-ADA
§ Case No. 6:20-cv-00958-ADA
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§ JURY TRIAL DEMANDED
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**DECLARATION OF JONATHAN K. WALDROP IN SUPPORT OF
PLAINTIFF WSOU INVESTMENTS, LLC D/B/A BRAZOS LICENSING
AND DEVELOPMENT'S OPPOSITION TO
DEFENDANT ONEPLUS TECHNOLOGY (SHENZHEN) CO., LTD.'S MOTION TO
STRIKE PLAINTIFF'S AMENDED INFRINGEMENT CONTENTIONS**

I, Jonathan K. Waldrop, declare as follows:

1. I am a Partner with the law firm of Kasowitz Benson Torres LLP. I am one of the attorneys responsible for the representation of Plaintiff WSOU Investments, LLC d/b/a Brazos Licensing and Development (“WSOU”) in this matter and make this declaration in support of WSOU’s Opposition to Defendant OnePlus Technology (Shenzhen) Co. Ltd.’s (“OnePlus”) Motion to Strike Plaintiff’s Amended Infringement Contentions.

2. If called to testify under oath in court, I could and would testify competently to the facts stated herein.

3. Attached hereto as **Exhibit A** is a true and correct copy of an email from Jacob J.O. Minne to Bradley P. Lerman and John Downing, dated December 1, 2021.

4. Attached hereto as **Exhibit B** is a true and correct copy of Defendant OnePlus Technology (Shenzhen) Co. Ltd. [sic] Objections and Responses to WSOU Investments, LLC's First Set of Interrogatories (Nos. 1-8).

I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information, and belief, formed after reasonable inquiry under the circumstances.

Executed on the 15th day of December, 2021, in San Mateo, California.

/s/ Jonathan K. Waldrop
Jonathan K. Waldrop